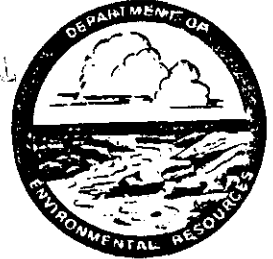




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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
1875 New Hope Street
Norristown, PA 19401
215 631-2413



June 2, 1981

Mr. Lee W. Thomas, Director
Bureau of Environmental Health
Bucks County Department of Health
Neshaminy Manor Center
Doylestown, PA 18901

Dear Mr. Thomas:

Enclosed is a copy of our review letter on areas A through F from the U.S. Steel Corporation, Fairless Works site, located in Falls Township, Bucks County. In our review of these applications we have attempted to address the comments mentioned in your letter of March 26, 1981 to Mr. Wayne Lynn.

We are in receipt of permit applications filed by the U.S. Steel Corporation involving encroachments on the Delaware River. Our Regional Hydrogeologist did not feel that an embankment was necessary for disposal site C and D as long as there was an adequate isolation distance between the eight foot sea level elevation and the bottom of the slag disposal area.

The concerns mentioned in your letter about area F (industrial waste disposal site) should be covered in the Phase II submission of the application which covers detailed design.

The submission for area E (hazardous waste disposal area) is very difficult for us to review at this time because we do not have regulations which adequately cover this type of site and I am not sure if we can approve a site like this which is within the 100 year flood plain area even if the area is modified.

Very truly yours,

LAWRENCE H. LUNSK
Regional Solid Waste Facilities Supervisor

Re V497

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QUAKERTOWN

JUN 10 1981

BUCKS CO.
DEPT. OF HEALTH

Department of Environmental Resources

1375 New Hope Street
Morristown, PA 17041
215 681-2413

June 3, 1981

U.S. Steel Corporation
Fairless Mills, PA 15030

Attention: R. T. Gunstrom
CM - 03

Gentlemen:

Our technical staff has reviewed the solid waste permit applications submitted for areas A, B, C and D which are for slag and demolition waste, area E for hazardous waste and area F for industrial or residual waste disposal at the U.S. Steel Corporation, Fairless Works site. Our comments are as follows on these applications

Area A - proposed for slag and Class III demolition waste. This site is divided into two sections, north and south. Both sections are old borrow pits. The north section contains standing water for most, if not all, of the year. This water is a combination of surface runoff and groundwater. The water level elevation is approximately 6.5 feet above sea level and appears to reflect the water elevation of Miles Creek and the Delaware River. This is also true for the south section although perhaps not the entire bottom of the pit. The depth to the bottom of the pits where they contain water is not known, however it is unlikely to be more than a few feet. From the information submitted, it is apparent that the bottom surface of both sections are less than 40 inches to the groundwater table.

The bottoms of both sections are below the 100 year flood level. However both sections are surrounded by a substantial 20 foot plus embankment. This precludes the possibility of flooding well above the 100 year level. There is an opening in the embankment of the south section which will have to be closed if Class II demolition waste and slag is to be disposed of in this section. Class III demolition waste is not permitted to be disposed of in a 100 year flood plain area. Slag and Class II demolition waste material can be disposed of on both sections of area A but this area must be prefilled with clean fill or Class I demolition waste to the eight foot elevation above sea level. The opening in the embankment would have to be filled in with Class I demolition waste only up to the eight foot elevation above sea level. Above this point it would be all right for slag disposal.

Area B - proposed for slag and Class III demolition waste. Area B is a large area partially filled with water to the east of area A. It is very similar to

H. G. Teel Corporation
June 3, 1981

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area A and the same conclusions and recommendations mentioned for area A would also apply to this area. This entire area is surrounded by 30 foot embankments. No Class III demolition waste disposal is permitted in this area.

Area C - proposed for sludge and Class III demolition waste disposal. This site is the west southerly of the site areas. It appears that only minimal excavation has occurred on this site and therefore only a small portion of the area is below the normal level of the Polkama River. It is also noted that the entire site is below the 15 foot, 100 year flood elevation line and no embankment is present or proposed. This site can be suitable for sludge and Class II demolition waste disposal if the low areas are filled with clean fill or Class I demolition material to at least the eight foot elevation above sea level before sludge disposal begins. No Class III demolition waste disposal is permitted for this area.

Area D - proposed for sludge and Class III demolition waste disposal. This site is the largest of all the proposed sites and is located to the north and adjacent to area C. This site is similar in its physical characteristics to area C and the same conclusions and recommendations made for area C would also apply to area D.

We must be supplied with cross-sectional plans of areas A through D which must indicate maximum final elevation of each disposal area and the western side slope angle. The enclosed include No. 6 must also be submitted along with route No. 8 for the monitoring well which will monitor each of these particular sites. This must include a plan for the restoration of the disposal area. An operational narrative must be submitted according to Chapter 75.37(8). All of this above information should be submitted to this office. We will need five copies for each site.

The quarterly analysis for the monitoring well for these four sites must also include sulfate and aluminum. This is not to be confused with groundwater information we have requested as part of your on-going groundwater study. This is specific for these sites only. Upon receipt and review of the information requested in the previous paragraphs, it is our feeling that we would be able to issue solid waste permits for areas A through D.

Area E - proposed for hazardous waste storage and disposal. We cannot complete our review of this portion of the application at this time because the detailed design regulations for hazardous waste land disposal sites have not been promulgated. I am not sure at this particular time whether we can approve the concept of a hazardous waste disposal site in a flood plain below the 100 year flood elevation even if this area is built up to a point where the bottom of the

W. J. Bevel Corporation
June 3, 1961

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disposal area is above this level. You may proceed with a Phase II application submission for area II after the commencement of our hazardous waste regulation covering the design of land disposal sites. In the meantime, you must contact the EPA Regional Office in Philadelphia concerning any requirements they may have on hazardous waste disposal sites at this time. We are currently operating under an interim primary agreement with EPA regarding the hazardous waste program. This is why you must be in contact with both agencies involving anything having to do with hazardous waste disposal.

Area I - proposed for industrial waste disposal. The plans for this area indicate that the bottom elevation of the lagoons will be brought up to the 16 foot elevation above sea level before a liner is employed and the subsequent elevation will be at 36 feet. This should preclude any possibilities of flooding or instability caused by liner placement below or too near the water table. The design details for such things as liner installation and the collection system will have to be worked out in the Phase II review. The Phase II design must follow the format outlined in Chapter 75.28 on page 40 of the regulations. I am assuming at this time that this site is for the disposal of industrial or residual wastes only and not treat otherwise you will have to follow the entire section for the design of sanitary landfills also. This must include an operational narrative plus the information required in Chapter 75.28(f)(3) such as utilities which must be included in the map submitted with this portion of the application.

An erosion and sedimentation control plan for earthmoving activities, which is approved by the county conservation district, will be necessary prior to the start of any construction on these sites. All trash refuse and other debris on these sites will have to be removed prior to the start of construction upon the receipt of any Department permits.

If you have any questions concerning the review of these particular applications, please contact me at 621-2413.

Very truly yours,

LAWRENCE H. LITNER
Regional Solid Waste Facilities Supervisor

CC: Mr. Lee Thomas, RCMD
Mr. E. V. Vaselenenko
Mr. David Cooper
Mr. Leon Constoner
See CAGS